



World Business Council for Sustainable Development



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The Greenhouse Gas Protocol

Scope 3 Accounting and Reporting Standard

Comment Template

We are providing this template to streamline public comment submissions. To use this template, please follow the instructions below:

- This Scope 3 draft is open for stakeholder comment from November 11, 2009 through December 21, 2009.
- To provide written comments, please use the comment template provided, instead of sending comments in a separate file or e-mail, in order to streamline the comment process.
- When using the comment template, please organize comments by chapter/section and reference page numbers and line numbers.
- If you have questions during the public comment process, please email Holly Lahd at hlahd@wri.org.
- Submit comments as an attached MS Word file by email to Holly Lahd at hlahd@wri.org no later than **Monday, December 21st, 2009**. We appreciate any effort to submit written comments before the deadline.

Feedback from (name):
Sandeep Mehndiratta,
Founder & CEO, Verdaes Inc.
sandeepm@verdaes.com
650-924-1006

Organization: Verdaes Inc.

Chapter/Section	Comments
The outline and overall structure of the document	•
Part 1	
1. Introduction	<ul style="list-style-type: none"> • 1.2 (Page 8, Line 14): Would help to identify type of organizations for which Scope 3 represents the largest percentage of emissions. For e.g. non-carbon intensive organizations such as financial services, software, retail, hospitality
2. Accounting & Reporting Principles	<ul style="list-style-type: none"> • 2 (Page 12, Line 15): What is the procedure if the organization wishes to change the data collection mechanism. Say they start with “secondary” data collection process but want to move to primary after say X years of



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	implementation.
3. Business Goals & Inventory Design	•
4. Mapping the Value Chain	•
5. Setting the Boundary	•
5.1 Prioritizing Relevant Emissions	• 5.1(Pg18/Line26): Industry based example would greatly help in determining how the prioritization and boundary setting is achieved.
5.2 Prioritizing Relevant Emissions Based on Size	•
5.3 Prioritizing Relevant Emissions Based on Other Criteria	<ul style="list-style-type: none"> • 5.3.1 (page 19, line 5) : Once the data is collected and action taken to influence the emission, can the activity that has resulted in significant reduction be removed from GHG accounting and reporting? • 5.3.2(Pg 21/Line 3): How should risk be accounted for in GHG Inventory reporting? How do they factor in while calculating emission? Note: Climate change related risks are mentioned throughout the document but how they are to be factored in and reported on is not clear. Will the effect any emission reporting number?
6. Collecting Data	•
6.1. Prioritizing Activities	•
6.2. Assessing Data Sources	• 6.2.2 (page 26) : What is the procedure for reversing data entry errors which would have resulted in erroneous emission data
6.3. Collecting data	<ul style="list-style-type: none"> • 6.3.1 (page 28) : When collecting upstream data for Scope 3, from a supplier, which period's emission should be considered for reporting. Example – We are collecting data for q3 -2009. The product we brought from our supplier was manufactured in q1-2009 and now the supplier's production line is producing new products. Should we report Scope 3 based on emission data of our supplier from q1-2009 or q3-2009. • 6.3.2(Pg29/Line 7) : If the value chain partner does not have a comprehensive solution for data collection in place, how would the reporting company factor it in while calculating its GHG emission.
7. Allocating Emissions	•
12. Assurance	<ul style="list-style-type: none"> • 12.1 (page 36/Line 19): The assurance section 12 is not clear on the coverage of the assurance effort beyond Scope 3. Only in this little section it seems to imply that assurance needs to be done for the full GHG Inventory (Scopes 1-2-3). Suggest clarifying this throughout in terms of impact in choosing assurance provider, timeline etc. • 12.4 (page 39/line 23): Should talk about secondary assurance reviews, subsequent to any changes executed in GHG inventory measurement resulting from a previous assurance review. Also should clarify need for recurring reviews on an ongoing bases • 12/6 (page 42/Line 7): Would help to provide a listing of potential assurance criteria to be defined by the reporting company • 12.8 (Pg 44/Line 40): Given that Scope 3 emission management is a new and evolving process, the recommendation to get pre-assurance should be made



	<p>mandatory. This will help companies avoid costly & time consuming mistakes</p> <ul style="list-style-type: none"> • General comment: The standard is not very explicit on the requirement for doing assurance reviews for compliance. Before submitting GHG inventory results to the relevant authorities, should an assurance review be considered mandatory or just nice to have? Is the size/type of the reporting company relevant in making this decision? Suggest adding a section on this
13. Reporting and Communication	<ul style="list-style-type: none"> • 13.1 (page 47/line 21): Suggest adding following information as mandatory because Scope 3 emissions will largely come from outside <ul style="list-style-type: none"> ○ A list of outside organizations e.g. tier 1 supply chain vendors contributing data to the report ○ % of emissions reported by outside organizations and qualitative comments on accuracy of that data • 13.2.1 (page 48/line 30): Information on expected GHG emissions resulting from the use of the product over its expected lifecycle • 13.2 (page 48/line 38): What level of detail should be provided when reporting emission such that the qualitative information provided reflects the context of collected data correctly
Part 2	
1. Purchased Goods and Services- Direct (Tier 1) Supplier Emissions	<ul style="list-style-type: none"> • 1.4 (Page 53/Line 17): No guidance is provided for calculating emissions in scope 3 category from shared facilities like data centers. Should an approach of allocating emissions based on usage of the computing facilities be applied where the provider comes up with an average factor = electricity usage for operations & cooling derived from average usage rates over a long period of time and allocation is based on hours of usage per customer (this data is typically available) • 1.4 (page 54/Line 2): Need guidance on contracting of services (IT, finance & back office functions) to a supplier that may be sharing resources or a pool to service different customers. With geographic distribution of such resource, an allocation basis needs to be developed •
2. Purchased Goods and Services – Cradle-to-Gate Emissions	<ul style="list-style-type: none"> • 2.3 (Page 56/Line 26): few examples for the two categories would help
3. Energy-Related Activities Not Included in scope 2	<ul style="list-style-type: none"> •
4. Capital Equipment	<ul style="list-style-type: none"> • 4.1 (Page 60/Line 33): Clarify that emissions from use of capital equipment (electricity, direct emissions) are calculated separately in the reporting companies Scope 1 & 2 emissions
5. Transportation & Distribution (upstream/inbound)	<ul style="list-style-type: none"> • 5 (General comment): Should mention ability to use the supplier's T&D management systems to extract existing data such as mode of transport, fuel type, distance travelled etc.
6. Business Travel	<ul style="list-style-type: none"> • 6.3 (Page 69Line 28): Most of the companies have well established expense report systems to manage expense related to business travel for invoicing and reimbursement. Reusing these systems to calculate emissions data needs to be mentioned •
7. Waste Generated in Operations	<ul style="list-style-type: none"> •
8. Franchises Not Included in Scope 1 and 2 (Upstream)	<ul style="list-style-type: none"> •



9. Leased Assets Not Included in Scope 1 and 2 (Upstream)	•
10. Investments Not Included in Scope 1 and 2	•
11. Franchises (Downstream)	•
12. Leased Assets (Downstream)	•
13. Transportation & Distribution (Downstream/ Outbound)	•
14. Use of Sold Products	• 14.3(Pg 84 Line 3): To calculate Energy consumed by sold product, how do we assume the average year for each product. Is there a industry wide standard or will it be something which the company decides.
15. Disposal of Sold Products at the End of Life	•
16. Employee Commuting	• 16.3(Pg89 Line17) How do we account for employees who carpool? Should give guidance on how to incorporate such scenarios.
Glossary	•
Any other general comments or feedback	•

